



Clean Harbors
ENVIRONMENTAL SERVICES, INC.
1501 WASHINGTON STREET
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Visit our Website at www.cleanharbors.com



SDMS DocID

446076

VIA CERTIFIED MAIL 7003 2260 0000 4695 6941
RETURN RECEIPT REQUESTED

January 27, 2005

DEP Northeast Regional Office
One Winter Street
Boston, MA 02108

Re: Immediate Response Action Status Report
Murphy's Waste Oil Service, Inc.
252 Salem Street, Woburn, Massachusetts
RTN #3-22144

Superfund Record Center
SITE: Wells G2H
RELEASE: 34
OFFICE: 446076

To Whom it May Concern:

Enclosed please find an Immediate Response Action Status Report that is being submitted by Clean Harbors Environmental Services, Inc. on behalf of Murphy's Waste Oil Service, Inc. for Release Tracking Number (RTN) #3-22144.

If you have any questions concerning this letter, please do not hesitate to contact me at (781) 849-1800, extension 1399.

Sincerely,

Charles J. McCreery, CPG
Senior Project Manager

Cc: Jeffrey H. Chormann, DEP Bureau of Waste Prevention (2 copies)
Joseph LeMay, USEPA
William F. Connors, CHES (w/o encl.)
George P. Luker, Esq. Old Oil Realty Trust (w/o encl.)
Joan E. Murphy, Old Oil Realty Trust

C:\Documents and Settings\mccreery\My Documents\CJM-Active\Murphy's Active\Correspondence\IRA Status Transmittal 1.27.05.doc

"People and Technology Creating a Better Environment"

**IMMEDIATE RESPONSE ACTION
STATUS REPORT**

**MURPHY'S WASTE OIL SERVICE, INC.
252 SALEM STREET
WOBURN, MASSACHUSETTS
DEP RTN #3-22144**

Prepared for:

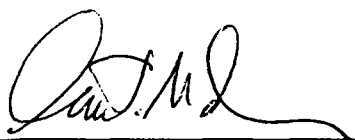
**Murphy's Waste Oil Service, Inc.
252 Salem Street
Woburn, MA 01801**

Prepared by:

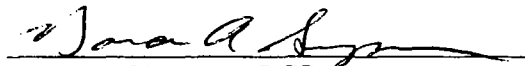
**Clean Harbors Environmental Services, Inc.
392 Libbey Industrial Parkway
Weymouth, Massachusetts 02189**

January 21, 2005

CHES Job No. EO906569



**Charles J. McCreery, CPG
Senior Project Manager**



**Dana A. Simpson, LSP
Manager, Remedial Investigations**



ENVIRONMENTAL SERVICES, INC.
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IMMEDIATE RESPONSE ACTION STATUS REPORT

Murphy's Waste Oil Service, Inc.
252 Salem Street
Woburn, Massachusetts

INTRODUCTION

This Immediate Response Action (IRA) Status Report has been prepared by Clean Harbors Environmental Services, Inc. (CHES) to document response actions relative to the presence of separate-phase oil discovered in two monitoring wells at the Murphy's Waste Oil Service, Inc. (Murphy's) facility located at 252 Salem Street in Woburn, Massachusetts (the "site"). The site is owned by Old Oil Realty Trust and is leased by Murphy's, a transfer, storage, and disposal facility for waste oil. Figure 1 shows the location of the site. An IRA Transmittal Form (BWSC-105) to accompany this Status Report is presented in Appendix A.

INCIDENT DESCRIPTION

Murphy's Waste Oil Service, Inc. holds a RCRA Part B Permit issued by the Massachusetts Department of Environmental Protection (DEP) Bureau of Waste Prevention pursuant to 310 CMR 30.000, the Hazardous Waste Regulations. Pursuant to requirements of the Part B Permit, Murphy's developed a Groundwater Monitoring Plan (GMP), dated April 8, 2002 to evaluate existing wells at the facility. The GMP included results of a comprehensive gauging event performed at the Murphy's site on November 5, 2001. Separate-phase oil was detected in three site wells, MW-7 (0.24 foot), MW-16 (0.44 foot), and MR-2SS (0.01 foot). The accumulation of separate-phase product in the wells was considered reflective of historic contamination that had been identified during previous Corrective Action Investigation performed pursuant to the Part B Permit between 1988 and 1998. These data were reported to the DEP Business Compliance Branch consistent with the manner of documenting previous investigation findings.

On August 26, 2002, the DEP Bureau of Waste Prevention issued a Notice of Noncompliance (NON) to CHES (the parent company of Murphy's) for failure to notify the DEP Bureau of Waste Site Cleanup (BWSC) of the accumulation of product greater than 1/2-inch as a new site condition. Specifically, the measured thickness of oil in wells MW-7 and MW-16 exceeded the 72-hour notification requirement for liquid non-aqueous phase liquid (LNAPL) accumulation greater than 1/2-inch on groundwater in a monitoring well.

Notification was made to the BWSC on September 25, 2002, and Release Tracking Number (RTN) 3-22144 was issued for the new site condition. Verbal approval was given by the BWSC to conduct an Immediate Response Action (IRA), consisting of gauging the LNAPL thickness in the wells, initially on a semi-monthly basis, and removal of LNAPL when it is encountered. The notification and approved IRA tasks were documented in an IRA Plan, dated November 22, 2002, and subsequent IRA Status Reports.

PREVIOUS IMMEDIATE RESPONSE ACTIONS

During the first gauging event on September 30, 2002, samples of LNAPL were collected from wells MW-7 and MW-16 for laboratory analysis of polychlorinated biphenyl compounds (PCBs by EPA Method 8082) and total petroleum hydrocarbon (TPH by GC/FID) to identify the petroleum type. The analytical results were presented in the IRA Plan. PCB compounds (Aroclor 1260) were detected in the oil samples from wells MW-7 and MW-16 at concentrations of 3.7 mg/kg and 19 mg/kg, respectively. The hydrocarbon products found in MW-7 and MW-16 were a close match to each other, and most closely resembled the laboratory's reference standard for lubricating oil.

During the gauging event on October 11, 2002, groundwater samples were collected from wells MW-7 and MW-16 for analysis of PCB, extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbon (VPH). The laboratory results were included in the IRA Plan. PCBs were not detected in either of the groundwater samples above the laboratory Practical Quantitation Limit (PQL) of 1 ug/l. VPH were not detected in the sample from MW-7. However, VPH were detected in the sample from MW-16 at a total concentration of 1,961 ug/l, and VPH target compounds were detected at a total concentration of 66 ug/l. EPH were detected in the samples from MW-7 and MW-16 at total concentrations of 618 ug/l and 13,703 ug/l, respectively. EPH target compounds were detected in the sample from MW-16 at a total concentration of 11.6 ug/l. It is possible that the results from MW-16 were reflective of a sheen contained in the sample.

The initial semi-monthly gauging frequency was intended to determine if LNAPL persists in wells MW-7 and MW-16, or if the occurrence was due to the low water table resulting from regional drought conditions. Wells MW-7 and MW-16 are gauged using an electronic oil/water interface probe. Oil is purged from the wells after gauging using a polyethylene bailer. The recovered oil is being accumulated in a dedicated drum staged at the site.

During each gauging event, the wetland adjacent to MW-7 and MW-16 is checked for the possible presence of an oil sheen. On January 10, 2003, an oil sheen was observed on surface water along a five-foot length of the wetland bank adjacent to well MW-16. The new site condition was reported to the DEP, which gave verbal approval to deploy absorbent boom to contain the sheen. As part of the ongoing IRA, three 8-foot sections of 8-inch diameter absorbent boom were placed in the wetland along the bank, centered on the area where the sheen was observed. Actions to deploy and maintain the boom were documented in a previous IRA Status Report, dated February 17, 2003.

On April 23, 2003, a limited subsurface investigation was performed to further delineate the extent of NAPL in the area of MW-16. Four soil borings (MW-22 through MW-25) were advanced surrounding MW-16, a fifth boring (MW-26) was placed adjacent to the wetland bank about 80 feet south of MW-16 to establish background conditions. Locations of the wells are shown in Figure 2. Of the five newly installed groundwater monitoring wells, only MW-24 has been observed to contain NAPL. MW-24 is located about 10 feet from MW-16.

Installation of new wells MW-22 through MW-25 was documented in an IRA Status Report and Plan Modification, dated August 21, 2003. Based on the initial evaluation of the new wells, the Plan Modification proposed removal of source soils in the area of MW-16 to address NAPL on the groundwater and the intermittent sheen on water in the wetland. It was proposed that soils be removed from an area approximately 20 feet by 10 feet and up to six feet below grade (up to 50 cubic yards) using dewatering, if needed.

STATUS OF IMMEDIATE RESPONSE ACTION

This IRA Status Report documents response actions conducted during the reporting period of March 2004 to November 2004. Field data sheets to date are presented in Appendix B. Tables 1 and 2 present a summary of the gauging data. During this reporting period, the wells were gauged and purged on July 8, 2004. Approximately five months had elapsed since the previous gauging/purging event. As a result, the maximum product thicknesses to date were observed in wells MW-16 (0.57 foot) and MW-24 (2.70 feet). Well MW-7 could not be found because the area had been regarded with crushed stone. No surface water was present in the wetland at the time of the site visit. Also during the July 8 event, the sorbent boom in the wetland was replaced.

As indicated in the previous IRA Status Report, implementation of the IRA (e.g. excavation) was initially postponed due to conditions of high water table in the wetland. High water levels in the wetland correspond to high water table, and raise the possibility of destabilizing the excavation walls during installation of the interceptor trench. Subsequent efforts to prepare the area for excavation were hampered when it was found that the work area is heavily overgrown with poison ivy. An evaluation of the situation by CHES' Health and Safety Department concluded that it would pose an unacceptable risk to employees to remove the poison ivy by mechanical means. CHES subsequently researched treating the poison ivy with chemicals and found only one contractor that performs large-scale applications specific to poison ivy that would be needed to treat the roughly 10,000 square-foot work area. However, to date the contractor has been unable to provide Material Safety Data Sheets and other information regarding the chemicals to the Woburn Conservation Commission for review.

In a letter dated August 23, 2004, CHES was notified by the US Environmental Protection Agency (USEPA) that the Murphy's site has been included on the Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) inventory of known or potential hazardous waste disposal areas. Murphy's is one of three properties collectively known as the Southwest Properties, a USEPA-designated part of the Wells G&H Superfund Site. As a result, the site has

been deferred from the RCRA Corrective Action Program and will now be regulated under CERCLA. A copy of the USEPA letter is included in Appendix C.

Based on data previously collected at Murphy's by CHES and investigations by others of the Whitney Barrel and Aberjona Auto Parts properties, the USEPA has completed a Baseline Risk Assessment of the Southwest Properties, dated March 2004. An executive summary of the Baseline Risk Assessment was included in a letter, dated April 14, 2004, a copy of which is attached in Appendix C. At the Murphy's site, cancer and non-cancer risks were found to human receptors due to the presence of PCBs and chromium in the wetland sediments. These risks to humans were within or below federal prescribed ranges for surface water in the wetland. Potential ecological risks were found to environmental receptors due to the presence of PCBs, chromium, and lead in the wetland sediments.

Because of the risks to human receptors from the wetland sediments, future large-scale remediation of the Southwest Properties is likely. CHES has not received any further directives from the USEPA since the August 23, 2004 letter. However, it is CHES' opinion that any excavation in close proximity to the wetland, such as that proposed under the IRA, should be coordinated with the USEPA efforts to avoid misdirected efforts. As such, CHES recommends that implementation of the proposed interceptor trench be postponed pending USEPA concurrence.

Because of the presence of separate-phase product in the monitoring wells at a thickness greater than 1/2-inch, and because an intermittent sheen has been observed on surface water in the adjacent wetland, the ongoing IRA will consist of periodic gauging/purging of the affected wells and maintenance of the sorbent boom in the wetland.

SCHEDULE

It is anticipated that the affected wells will be gauged and purged on a quarterly basis, and the boom will be replaced as necessary.

Upon DEP approval of postponing excavation at the site, CHES will seek a Certificate of Completion from the Woburn Conservation Commission to close the existing Order of Conditions that is no longer needed.

Status Reports will be forwarded to the DEP on a semi-annual basis to document ongoing efforts made under the IRA. These reports will include a discussion of planned site work under the CERCLA Program.

In accordance with the NON, a copy of this IRA Status Report is being submitted to the DEP Bureau of Waste Prevention concurrently with submittal to the BWSC.

/

TABLES

TABLE 1
GROUNDWATER ELEVATION

Murphy's Waste Oil Service, Inc.
252 Salem Street
Woburn, Massachusetts

Date	MW-7	MW-16	MW-22	MW-23	MW-24	MW-25	MW-26
11/5/2001	44.5	43.13	---	---	---	---	---
9/30/2002	45.36	43.59	---	---	---	---	---
10/11/2002	45.12	43.78	---	---	---	---	---
10/31/2002	45.47	44.21	---	---	---	---	---
11/8/2002	45.58	44.31	---	---	---	---	---
12/2/2002	45.88	44.32	---	---	---	---	---
12/18/2002	46.85	45.17	---	---	---	---	---
1/10/2003	---	45.05	---	---	---	---	---
1/13/2003	46.71	44.98	---	---	---	---	---
2/14/2003	46.50	45.41	---	---	---	---	---
4/9/2003	43.75	45.35	---	---	---	---	---
5/5/2003	45.72	44.81	---	---	---	---	---
5/12/2003	---	---	44.78	44.78	44.78	44.82	44.81
6/4/2003	46.04	45.20	45.93	45.13	45.11	45.17	46.02
7/2/2003	45.15	44.32	44.46	44.47	44.18	44.56	44.64
8/18/2003	44.81	44.49	44.72	44.65	44.61	44.76	44.80
10/2/2003	43.78	43.57	43.57	43.67	43.7	43.77	43.97
2/3/2004	44.19	43.75	43.70	43.72	43.86	43.81	44.30
7/8/2004	---	43.36	43.24	43.17	43.26	44.63	43.47

Notes:

1. Water elevations in feet, corrected for oil thickness.

TABLE 2
PRODUCT THICKNESS

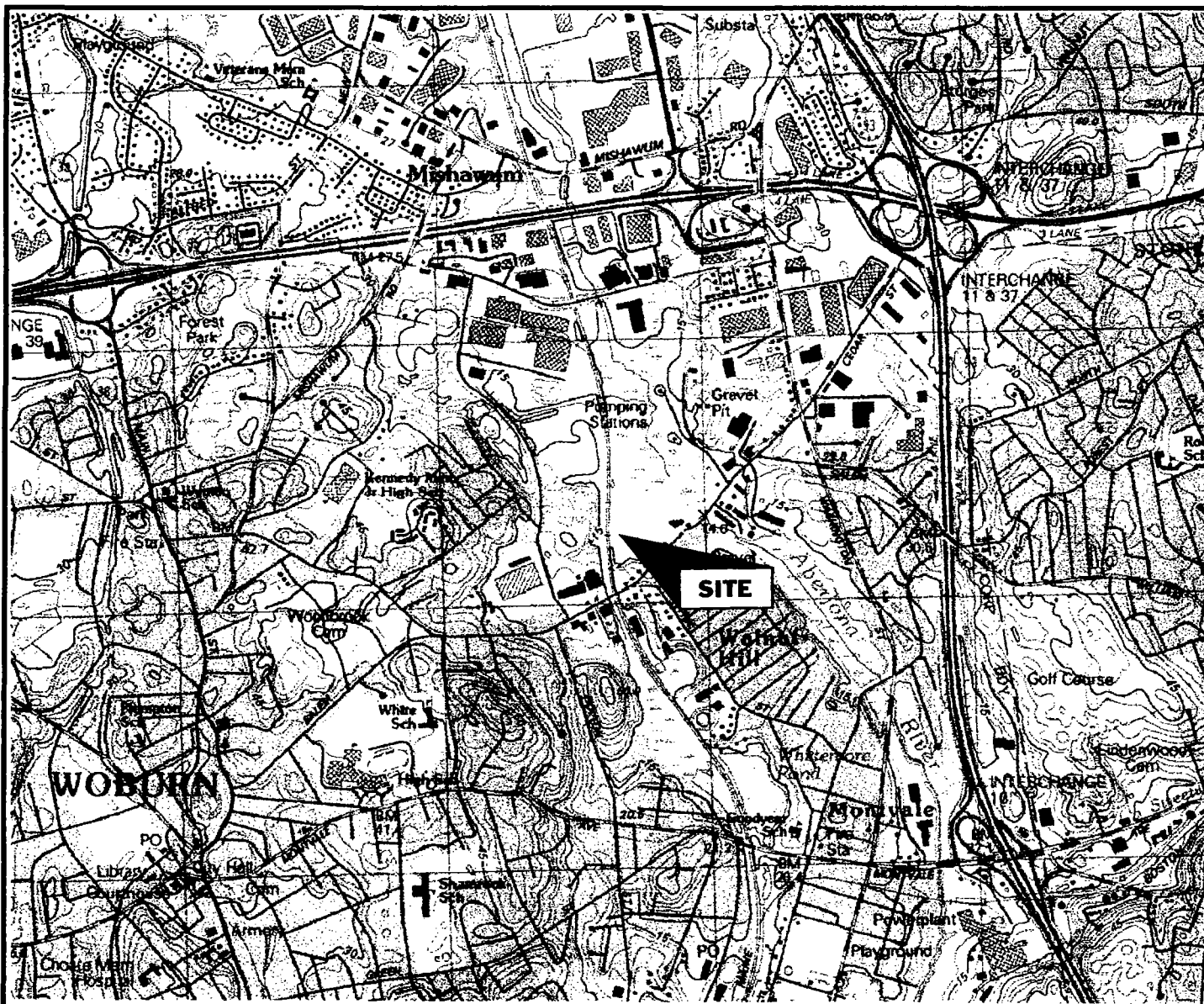
Murphy's Waste Oil Service, Inc.
252 Salem Street
Woburn, Massachusetts

Date	MW-7	MW-16	MW-22	MW-23	MW-24	MW-25	MW-26
11/5/2001	0.24	0.44	---	---	---	---	---
9/30/2002	0.59	0.35	---	---	---	---	---
10/11/2002	0.01	0.40	---	---	---	---	---
10/31/2002	0.02	0.33	---	---	---	---	---
11/8/2002	0.00	0.21	---	---	---	---	---
12/2/2002	0.00	0.02	---	---	---	---	---
12/18/2002	0.00	0.00	---	---	---	---	---
1/10/2003	---	0.00	---	---	---	---	---
1/13/2003	0.00	0.00	---	---	---	---	---
2/24/2003	0.00	0.00	---	---	---	---	---
4/9/2003	0.00	0.00	---	---	---	---	---
5/5/2003	0.00	0.00	---	---	---	---	---
5/12/2003	---	---	0.00	0.00	0.87	0.00	0.00
6/4/2003	0.00	0.00	0.00	0.00	0.91	0.00	0.00
7/2/2003	0.00	0.00	0.00	0.00	2.00	0.00	0.00
8/18/2003	0.01	0.56	0.00	0.00	0.91	0.00	0.00
10/2/2003	0.05	0.55	0.00	0.00	1.03	0.00	0.00
2/3/2004	0.00	0.46	0.00	0.00	0.30	0.00	0.00
7/8/2004	---	0.57	0.00	0.00	2.70	0.00	0.00

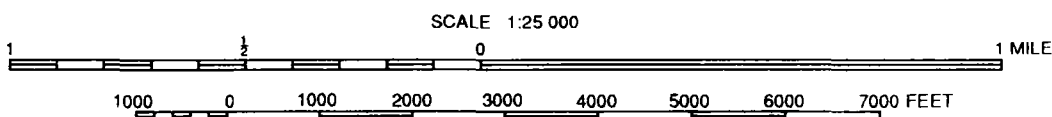
Notes:

1. Product thickness in feet.

FIGURES



QUADRANGLE LOCATION



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



COORDINATES		A		IRA STATUS		LM	LM	COM	2/04
UTM: 4706254 mN 324682 mE									
LONGITUDE: W 71°07'60"									
LATITUDE: N 42°29'27"									

BASE MAP: USGS topographic map printed from TOPO! © 1998 Wildflower Productions

CleanHarbors

Environmental Services, Inc.
Remedial Technologies Division

1501 WASHINGTON STREET
BRAINTREE, MASSACHUSETTS 02185
(781) 849-1800

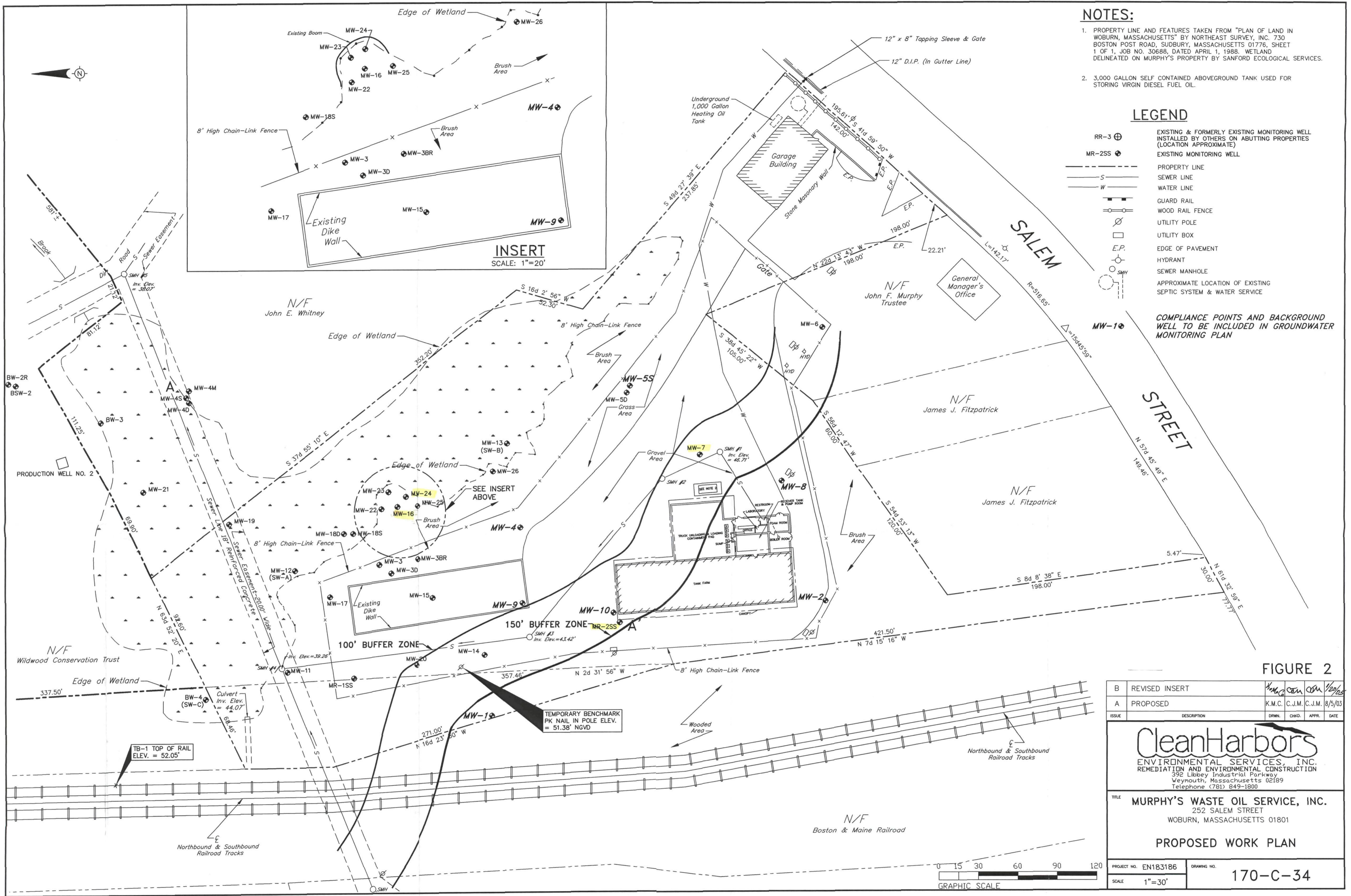
Murphy's Waste Oil Service
252 Salem Street
Woburn, Massachusetts
LOCUS MAP

JOB NO.: EN-183186

SCALE: AS SHOWN

DWG. NO.

FIGURE 1





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: _____

2. Street Address: 252 Salem Street

3. City/Town: Woburn

4. ZIP Code: 01801-0000

☐ 5. Check here if a Tier Classification Submittal has been provided to DEP for this Disposal Site.

☐ a. Tier 1A ☐ b. Tier 1B ☐ c. Tier 1C ☐ d. Tier 2

☐ 6. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):

☐ a. CERCLA ☐ b. HSWA Corrective Action ☐ c. Solid Waste Management

☒ d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): _____ (MM/DD/YYYY)

☐ 2. Submit an **Initial IRA Plan**.

☐ 3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.

☐ 4. Submit an **Imminent Hazard Evaluation** (check one)

☐ a. An Imminent Hazard exists in connection with this Release or Threat of Release.

☐ b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.

☐ c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.

☐ d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

☐ 5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.

☒ 6. Submit an **IRA Status Report**.

☐ 7. Submit an **IRA Completion Statement**.

☐ a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. State Release Tracking Number of Tier Classified Site (Primary RTN):

-

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

☐ 8. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☐ a. Air ☐ b. Basement ☐ c. Critical Exposure Pathway ☒ d. Groundwater ☐ e. Residence
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments
☐ k. Soil ☐ l. Storm Drain ☒ m. Surface Water ☐ n. Unknown ☒ o. Wetland ☐ p. Zone 2
☒ q. Others Specify: greater than 1/2-inch LNAPL on groundwater in monitor well.

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☒ a. Oils ☐ b. Chlorinated Solvents ☐ c. Heavy Metals
☐ d. Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply. for volumes list cumulative amounts)

- | | |
|---|---|
| <input type="checkbox"/> 1. Assessment and/or Monitoring Only | <input type="checkbox"/> 2. Temporary Covers or Caps |
| <input checked="" type="checkbox"/> 3. Deployment of Absorbent or Containment Materials | <input type="checkbox"/> 4. Temporary Water Supplies |
| <input type="checkbox"/> 5. Structure Venting System | <input type="checkbox"/> 6. Temporary Evacuation or Relocation of Residents |
| <input checked="" type="checkbox"/> 7. Product or NAPL Recovery | <input type="checkbox"/> 8. Fencing and Sign Posting |
| <input type="checkbox"/> 9. Groundwater Treatment Systems | <input type="checkbox"/> 10. Soil Vapor Extraction |
| <input type="checkbox"/> 11. Bioremediation | <input type="checkbox"/> 12. Air Sparging |
| <input type="checkbox"/> 13. Excavation of Contaminated Soils | |

- ☐ a. Re-use, Recycling or Treatment ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Facility Name: _____ Town: _____ State: _____

ii. Facility Name: _____ Town: _____ State: _____

iii. Describe: _____

- ☐ b. Store ☐ i. On Site Estimated volume in cubic yards _____
☐ ii. Off Site Estimated volume in cubic yards _____

ii. Facility Name: _____ Town: _____ State: _____

ii. Facility Name: _____ Town: _____ State: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☐ c. Landfill

☐ i. Cover Estimated volume in cubic yards _____

Facility Name: _____ Town: _____ State: _____

☐ ii. Disposal Estimated volume in cubic yards _____

Facility Name: _____ Town: _____ State: _____

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Facility Name: _____ Town: _____ State: _____

c. Facility Name: _____ Town: _____ State: _____

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Facility Name: _____ Town: _____ State: _____

c. Facility Name: _____ Town: _____ State: _____

☐ 16. Other Response Actions:

Describe: _____

☐ 17. Use of Innovative Technologies:

Describe: _____



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

E. LSP SIGNATURE AND STAMP :

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;


> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation complies(y) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Status Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

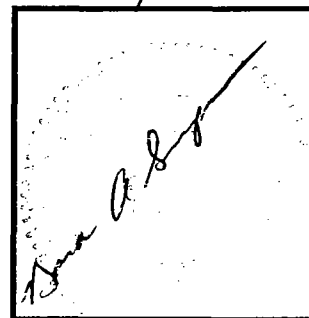
I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. First Name: Dana 2. Last Name: Simpson
3. Telephone: (781) 849-1800 4. Ext.: 1163 5. FAX: (781) 794-1760

6. Signature:  7. Date: 1/20/05

8. LSP #: 3497

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

F. PERSON UNDERTAKING IRA:

1. Check all that apply: ☐ a. change in contact name. ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: Murphy's Waste Oil Service, Inc.
3. Contact First Name: William 4. Last Name: Connors
5. Street: PO Box 859048 6. Title: Vice President
7. City/Town: Braintree 8. State: MA 9. ZIP Code: 02185-9048
10. Telephone: (781) 849-1800 11. Ext.: 1357 12. FAX: _____

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

- ☒ 1. RP or PRP ☐ a. Owner ☒ b. Operator ☐ c. Generator ☐ d. Transporter
☐ e. Other RP or PRP Specify: _____
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking IRA Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
☐ A Release Abatement Measure (RAM) Plan (BWSC106) ☐ Phase IV Remedy Implementation Plan (BWSC108)
- ☒ 2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
- ☐ 5. Check here if any non-updatable information provided on this form is incorrect, e.g. Site Address/Location Aid. Send corrections to the DEP Regional Office.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 22144

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

William F. Connors

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: William F. Connors 3. Title: Vice President
Signature

4. For: Murphy's Waste Oil Service, Inc. 1/19/05
(Name of person or entity recorded in Section F) (mm/dd/yyyy)

☐ 5. Check here if the address of the person providing certification is different from address recorded in Section F.

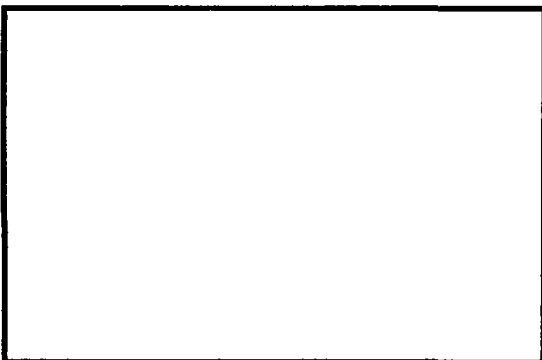
6. Street: _____

7. City/Town: _____ 8. State: _____ 9. ZIP Code: _____

10. Telephone: _____ 11. Ext.: _____ 12. FAX: _____

**YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY
RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU
MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.**

Date Stamp (DEP USE ONLY:)





APPENDIX B

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 11/5/01
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	7.24	7.48	0.24	44.50			
MW-16	12	50.24	7.05	7.49	0.44	43.13			
MR-2SS	15	51.03	7.79	7.80	0.01	43.24			

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 9/30/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	6.33	6.92	0.59	45.36	1/4	no water in wetland	6.34
MW-16	12	50.24	6.60	6.95	0.35	43.59	1/4	no water in wetland	6.60

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 10/11/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	6.65	6.66	0.01	45.12	5	no water in wetland	6.65
MW-16	12	50.24	6.41	6.81	0.40	43.78	3	no water in wetland	6.45-7.00 emulsified

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 10/31/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	6.30	6.32	0.02	45.47	4	no sheen in wetland	6.31
MW-16	12	50.24	5.99	6.32	0.33	44.21	3.5	no sheen in wetland	6.00

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 11/8/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	ND	6.19	0.00	45.58	5	no sheen in wetland	
MW-16	12	50.24	5.90	6.11	0.21	44.31		no sheen in wetland	

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 12/2/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	ND	5.89	0.00	45.88	5	no sheen in wetland	5.89
MW-16	12	50.24	5.92	5.94	0.02	44.32	4	no sheen in wetland	5.93
MW-2SS	15	51.03	ND	6.47	0.00	44.56			

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 12/18/02
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	ND	4.92	0.00	46.85	3	no sheen in wetland	
MW-16	12	50.24	ND	5.07	0.00	45.17	3	no sheen in wetland	

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 1/10/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	covered by puddle		0.00			no sheen on water under ice	
MW-16	12	50.24	ND	5.19	0.00	45.05		sheen on water under ice	

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

Installed hydrophobic bailer in MW-16

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 1/13/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	ND	5.06	0.00	46.71		no sheen	
MW-16	12	50.24	ND	5.26	0.00	44.98		install boom, slight sheen	

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 2/24/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	51.77	ND	5.27	0.00	46.50		no sheen	
MW-16	12	50.24	ND	4.83	0.00	45.41		no sheen	

1. Well reference elevations determined at top of PVC well rim. MW-7 reference includes 1.30-foot riser pipe.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 4/9/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	ND	7.14	0.00	43.75			
MW-16	12	50.24	ND	4.89	0.00	45.35		sheen in 6" x 6" area	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 5/5/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	ND	5.17	0.00	45.72	3	no sheen	
MW-16	12	50.24	ND	5.43	0.00	44.81	3	no sheen	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 5/12/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	---	---	---	---			
MW-16	12	50.24	---	---	---	---			
MW-22	8	50.00	ND	5.22	0.00	44.78			
MW-23	8	49.17	ND	4.39	0.00	44.78			
MW-24	8	49.30	4.41	5.28	0.87	44.78	1/4	slight sheen in wetland	4.61-4.92
MW-25	8	49.84	ND	5.02	0.00	44.82			
MW-26	8	50.11	ND	5.30	0.00	44.81			

emulsified

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 6/4/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89		4.85	0.00	46.04		water present, no sheen	
MW-16	12	50.24		5.04	0.00	45.20		water present, no sheen	
MW-22	8	50.00		4.07	0.00	45.93		water present, no sheen	
MW-23	8	49.17		4.04	0.00	45.13		water present, no sheen	
MW-24	8	49.30	4.07	4.98	0.91	45.11	.1	water present, no sheen	
MW-25	8	49.84		4.67	0.00	45.17		water present, no sheen	
MW-26	8	50.11		4.09	0.00	46.02		water present, no sheen	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 7/2/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	ND	5.74	0.00	45.15		oil on probe, no sheen	
MW-16	12	50.24	ND	5.92	0.00	44.32		oil on probe	
MW-22	8	50.00	ND	5.54	0.00	44.46		no water	
MW-23	8	49.17	ND	4.70	0.00	44.47		no water	
MW-24	8	49.30	4.86	6.86	2.00	44.18	1/4	no water	
MW-25	8	49.84	ND	5.28	0.00	44.56		no sheen	
MW-26	8	50.11	ND	5.47	0.00	44.64		no sheen	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 8/18/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	6.08	6.09	0.01	44.81	1	no sheen; water present	6.08
MW-16	12	50.24	5.68	6.24	0.56	44.49	1	no sheen; water present	5.47
MW-22	8	50.00	ND	5.28	0.00	44.72		no sheen; water present	
MW-23	8	49.17	ND	4.52	0.00	44.65		no sheen; water present	
MW-24	8	49.30	4.57	5.48	0.91	44.61	1/2	no sheen; water present	4.92
MW-25	8	49.84	ND	5.08	0.00	44.76		no sheen; water present	
MW-26	8	50.11	ND	5.31	0.00	44.80		no sheen; water present	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 10/2/03
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	7.10	7.15	0.05	43.78	1	no water present in wetland	7.12
MW-16	12	50.24	6.60	7.15	0.55	43.57	1	no water present in wetland	7.03
MW-22	8	50.00	ND	6.43	0.00	43.57		no water present in wetland	
MW-23	8	49.17	ND	5.50	0.00	43.67		no water present in wetland	
MW-24	8	49.30	5.47	6.50	1.03	43.70	1/4	no water present in wetland	6.29
MW-25	8	49.84	ND	6.07	0.00	43.77		no water present in wetland	
MW-26	8	50.11	ND	6.14	0.00	43.97		no water present in wetland	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 2/3/04
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	6.70	6.70	0.00	44.19	1/2	frozen, couldn't break through	6.69
MW-16	12	50.24	6.43	6.89	0.46	43.75	1	ice (like 6 oil)	6.68
MW-22	8	50.00	ND	6.30	0.00	43.70	0		
MW-23	8	49.17	ND	5.45	0.00	43.72	0		
MW-24	8	49.30	5.40	5.70	0.30	43.86	1	brn color, airy, emulsified	5.45
MW-25	8	49.84	ND	6.03	0.00	43.81	0		
MW-26	8	50.11	ND	5.81	0.00	44.30	0		

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.

WELL MONITORING FIELD DATA

Murphy's Waste Oil Facility
252 Salem Street
Woburn, Massachusetts

Sample Date: 7/8/04
CHES Rep: L. McNeil

Location	Well Depth	Reference Elevation	Depth to Oil	Depth to Water	Total Thickness	Water Elevation	Purged (gals.)	Comments: Adjacent Wetland Insp. presence/sheen	Regauge
MW-7	12	50.89	---	---	---	---	---	can't find, recently regraded area with bulldozer	
MW-16	12	50.24	6.81	7.38	0.57	43.36	3/4	no water in wetland	
MW-22	8	50.00	ND	6.76	0.00	43.24	0	no water in wetland	
MW-23	8	49.17	ND	6.00	0.00	43.17	0	no water in wetland	
MW-24	8	49.30	5.69	8.39	2.70	43.26	1/4	no water in wetland	
MW-25	8	49.84	ND	5.21	0.00	44.63	0	no water in wetland	
MW-26	8	50.11	ND	6.64	0.00	43.47	0	no water in wetland	

1. Well reference elevations determined at top of PVC well rim.
2. --- not gauged; ND not detected
3. Water levels corrected for product thickness using specific gravity of 0.87 for oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

August 23, 2004

William Connors
Clean Harbors of Braintree
1501 Washington Street
P.O. Box 859048
Braintree, MA 02185-9048

Subject: Murphys Waste Oil Service
252 Salem Street
Woburn, MA 01801
EPA ID# MAD066588005

Dear Mr. Connors:

I am writing to inform you that the U.S. EPA intends to utilize the Comprehensive Environmental Response Compensation Liability Act (CERCLA) program to oversee investigation and remedial activities at the property known as Murphy's Waste Oil Service located at 252 Salem Street in Woburn, Massachusetts. The facility has been recorded into the Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) inventory of known or potential hazardous waste disposals areas. Currently, Clean Harbors of Braintree is listed as the operator of the facility, under the name "Murphy Waste Oil, A Division of Clean Harbors".

The Murphy's Waste Oil Service facility would be subject to EPA's RCRA Corrective Action Program were it not located within the Wells G&H Superfund (NPL) site boundaries. As part of the Wells G&H Superfund Site, EPA and the Massachusetts Department of Environmental Protection (DEP), along with the Wells G&H Site Settling Defendants under a 1991 Consent Decree, have been investigating the Murphy Waste Oil property, as well as two other properties known as Whitney Barrel at 256 Salem Street, and Aberjona Auto Parts at 278 - 280 Salem Street. These three properties are adjacent to each other, and collectively known as the Southwest Properties at the Wells G&H Site. In March 2004, EPA, in consultation with MADEP, completed a "Baseline Human Health and Ecological Risk Assessment, Southwest Properties, Wells G&H Superfund Site, Operable unit 2." On April 14, 2004, a copy of this document was provided to Clean Harbors.

By deferring the facility from RCRA to CERCLA, EPA does not intend to include the Murphy's site on the RCRA Corrective Action 2008 Government Performance and Results Act (GPRA) Baseline. However, the facility will continue to be tracked under the 2005 GPRA Baseline. EPA's goal for sites on the 2005 GPRA baseline is to meet two Environmental Indicators, known as Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control, before the close of September

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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2005. The facility achieved the Current Human Exposures Under Control indicator in September of 2003 and has yet to achieve the Migration of Contaminated Groundwater Under Control indicator. Data collection efforts under CERCLA may be used to support environmental indicator determinations.

EPA may consider deferring the facility back to the RCRA Corrective Action program at a future time, depending on the outcome of the CERCLA actions. Please note that EPA is committed to the principle of parity between the RCRA Corrective Action and CERCLA programs and we do not expect a future need to repeat investigations or cleanup activities upon a shift between the federal cleanup programs.

Finally, please note that this deferral does not relieve you of any non-Corrective Action obligations under RCRA or of any requirements set out in your RCRA Operating License issued by the MA DEP.

If you have any questions regarding the deferral process or the GPRA, please contact Frank Battaglia, at 617 918-1362. For questions regarding the Wells G&H Superfund Site and the Superfund process, please contact Joseph LeMay at 617 918-1323. Mr. LeMay is the Wells G&H Superfund Site remedial project manager.

Sincerely,



Susan Studien, Director
Office of Site Remediation and Restoration

cc: Matthew Hoagland, EPA
Frank Battaglia, EPA
Joseph LeMay, EPA
Bob Cianciarulo, EPA
Nancy Smith, EPA
Mary Jane O'Donnell, EPA
Jeffrey Chormann, MA DEP BWP
Jay Naparstek, MA DEP BWSC
Anna Mayor, MA DEP BWSC
Charlie J. McCreery, Clean Harbors
Joan Murphy, Trustee (mailing address: 16 Harriet Avenue, Burlington, MA 01803)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

April 14, 2004

See Attached Address List

Re: Results of EPA's Baseline Risk Assessment for the Southwest Properties dated March 2004

Dear Recipients:

The U.S. Environmental Protection Agency (EPA) has completed a "Baseline Human Health and Ecological Risk Assessment" for the Southwest Properties of the Wells G&H Superfund Site. The Wells G&H Site is approximately 330 acres in Woburn, MA, and generally bounded by Route 128 to the north, Salem and Cedar Street to the south, MBTA ROW to the west, and Interstate 93 to the east. The Southwest Properties are three properties situated in the southwest corner of Wells G&H Site, and consist of the Murphy Waste Oil facility at 252 Salem Street, Woburn, MA, former Whitney Barrel facility at 256 Salem Street, Woburn, MA, and former Aberjona Auto Parts facility at 278-280 Salem Street, Woburn, MA.

Under the Superfund program, the baseline risk assessment provides an evaluation of the potential threat to human health and the environment a site may pose in the absence of any remedial action/ cleanup. The baseline risk assessment provides one of the bases for determining whether or not federal remedial action is necessary. Please find attached a copy of the Baseline Risk Assessment (BRA) for the Southwest Properties, prepared by Metcalf & Eddy and TRC Environmental Corporation, dated March 2004.

The BRA divided the three facilities listed above into four categories: Aberjona Site, Whitney Site, Murphy Site, and Murphy Wetland (see attached Figure ES-1 Site Plan). The Murphy Wetland is primarily situated on the Murphy Waste Oil property and former Whitney Barrel property, and to a lesser degree on the Wildwood Conservation Trust property immediately to the north. A tributary flowing from the west to east flows through the Murphy Wetland and discharges to the Aberjona River. In addition, the BRA established a fifth category to evaluate potential risks to human health from groundwater underneath the Southwest Properties. This category, entitled Groundwater Risk To Off-Site Resident, assessed federal groundwater risks to residences beyond the Southwest Properties which could use the aquifer in the future for drinking water purposes.

The executive summary summarizes the significant federal human health and ecological risks and the contaminants causing most of the risk at the Southwest Properties as follows (see report for full details):

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Human Health Risks

Groundwater Risk To Off-Site Resident: EPA has determined that groundwater underneath all the Southwest Properties (**Aberjona Site, Whitney Site, Murphy Site and Murphy Wetland**), as illustrated by the blue hash marks on the attached Figure ES-2, pose a risk under federal standards. Specifically, lifetime cancer and non-cancer risks (e.g., reproductive effects, organ dysfunction, neurological effects, etc.) were above federal prescribed risk ranges for the future resident exposed to groundwater extracted from the Southwest Properties for household use. The contaminants and exposure routes causing most of the risk are direct contact with 1,3-dichlorobenzene, benzene, cis-1,2-dichloroethene, trichloroethene, vinyl chloride, C9-C18 Aliphatic Hydrocarbons, C11-C22 Aromatic Hydrocarbons, arsenic, and manganese. The inhalation pathway also may present lifetime cancer and non-cancer risks above federal prescribed risk ranges primarily from 1,1,2-trichloroethane and trichloroethene. However, lifetime cancer and non-cancer risks for contact with shallow groundwater (less than 15 feet below the ground surface) underneath the Southwest Properties for a construction worker scenario indicates lower level risks within or below federal prescribed risk ranges.

Aberjona Site: Lifetime cancer and non-cancer risks indicates lower level risks within or below the federal prescribed risk ranges for all scenarios and pathways evaluated for soil.

Whitney Site: Lifetime cancer and non-cancer risks were above federal prescribed risk ranges for Current and Future Commercial Worker, Future Recreational User, and Future Construction Worker scenarios exposed to soils. The major risks for the Commercial Worker include direct contact with polychlorinated biphenyls (PCBs) in surface soil as well as inhalation of certain Hydrocarbons in indoor air originating from subsurface soil. Major risks for Recreational Users are direct contact with PCBs in surface soil, and PCBs and chlordane (a pesticide) in subsurface soil. The major risks for the Construction Worker are direct contact with PCBs and chlordane in subsurface soil.

Murphy Site: Lifetime cancer and non-cancer risks indicates lower level risks within or below the federal prescribed risk ranges for all scenarios and pathways evaluated for soil.

Murphy Wetland: Lifetime cancer and non-cancer risks were above federal prescribed risk ranges for the Future Recreational User exposed to sediments. Certain non-cancer risks were above federal prescribed risk ranges for the Future Trespasser exposed to sediments. The Future Trespasser was mainly at risk from PCBs in sediment. The main risk for the Future Recreational User are from contact with chromium and PCBs in sediment. Lifetime cancer and non-cancer risks indicates lower level risks within or below federal prescribed risk ranges for all scenarios and pathways evaluated for surface water.

Please find attached Figure ES-2 which illustrates the major human health risk drivers for soils, sediments, and groundwater use at the Southwest Properties.

Ecological Risks

Murphy Wetland: The ecological risk assessment divides the Murphy Wetland into two habitat areas, seasonally ponded and forested shrub areas, and suggests that PCBs in sediments may pose current and future risks to mammals, as represented by the muskrat and/or short-tailed shrew. PCBs may also pose current and future risks to sediment organisms inhabiting the seasonally ponded area. In addition, several inorganic contaminants (e.g., chromium and lead) in sediments may also pose risk to mammals foraging within the seasonally ponded area as well as sediment organisms inhabiting this area.

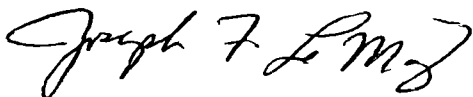
Please find attached Figure ES-3 which illustrates the major ecological risk drivers at the Southwest Properties.

To summarize further, it appears PCBs and Hydrocarbons in soil drive human health risks at the Whitney Site, PCBs and chromium in sediments drive human health and PCBs, chromium and lead drive ecological risks at the Murphy Wetland, and trichloroethene, vinyl chloride, and 1,1,2-trichloroethane drive human health risks in groundwater throughout the Southwest Properties. A more detailed description of the risk results can be found in Sections 3, 4 and 5 of the Baseline Risk Assessment.

This BRA is part of operable/ management unit 2 (OU-2) Remedial Investigation/ Feasibility Study for the Wells G&H Site. In the future, an additional Baseline Risk Assessment shall be completed for the remaining portions of the Wells G&H groundwater that have not yet been addressed, as required under the 1989 Wells G&H Superfund Site Record of Decision and 1991 Consent Decree.

If you should have any questions regarding this BRA for the Southwest Properties, please contact me at (617) 918-1323. Note: An electronic copy of this BRA will soon become available on the internet at EPA's Wells G&H web site.

Sincerely,



Joseph F. LeMay, P.E.
Remedial Project Manager
Office of Site Remediation and Restoration

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Mayor John Curran
Woburn City Hall
10 Common Street
Woburn, MA 01801

Woburn Public Library
Attention: Director
45 Pleasant Street
Woburn, MA 01801

MURPHY WETLAND	
Major Risk Drivers	Media
PCB Aroclors	SD
chromium III	SD

NO RISK FROM SURFACE WATER

STORMWATER
CULVERTS

MURPHY
WETLAND

WILDWOOD
PROPERTY

MURPHY SITE

FORMER RESIDENCES

SALEM STREET

ABERJONA
SITE

RESIDENCE

ONE AND WATER SUPPLY
TO HOME




LEGEND

WETLAND ——— STREAM OR
WETLAND
——— PROPERTY LINE

WHITNEY SITE	
Major Risk Drivers	Media
PCB Aroclors	SS
C5-C8 Aliphatic Hydrocarbons (Future Only)	IA
C9-C18 Aliphatic Hydrocarbons (Future Only)	IA
PCB Aroclors (Future Only)	S
Chlordanes (Future Only)	S
PCB Cogeners (Future Only)	S

GROUNDWATER RISK TO OFF-SITE RESIDENT	
Major Risk Drivers	Media
1,3-dichlorobenzene	DW
benzene	DW
cis-1,2-dichloroethene	DW
trichloroethene	DW
vinyl chloride	DW
C9-C18 Aliphatic Hydrocarbons	DW
C11-C22 Aromatic Hydrocarbons	DW
arsenic	DW
manganese	DW
1,1,2-trichloroethane	S

LEGEND:

 COPCs CONTRIBUTING TO FUTURE RISK
 COPCs CONTRIBUTING TO CURRENT AND FUTURE RISK
 GROUNDWATER WITH FUTURE DW/IS RISK TO OFFSITE RESIDENT

Affected Media	
Surface Soil	SS
Subsurface Soil	S
Indoor Air	IA
Inhalation During Showering	IS
Sediment	SD
Groundwater/Drinking Water	DW

NOTE:
MAJOR RISK DRIVERS ONLY
(ILCR > 10⁻⁴ AND TARGET ORGAN
HI > 1) SEE REPORT FOR
DISCUSSION OF OTHER RISK
CONTRIBUTORS.

APPROXIMATE
GRAPHIC SCALE
0' 50' 100'

SOURCE:
SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT, SOUTHWEST PROPERTIES,
VOLUME 1 OF XXIII, WELLS G&H SUPERFUND SITE, WOBURN, MASSACHUSETTS,
AUGUST 2003

02136/SOUTHWEST/RISK ASSESSMENT/ea2.3

FIGURE ES-2
HUMAN HEALTH
MAJOR RISK DRIVERS

SOUTHWEST PROPERTIES
WELLS G&H SUPERFUND SITE
OPERABLE UNIT 2
WOBURN, MASSACHUSETTS

M&E Metcalf & Eddy

TRC Boott Mills South
Foot of John Street
Lowell, MA 01852
978-970-5600

TRC PROJ NO: 02136-0390-01487

EPA CONTRACT NO: 68-W8-0042

RAC SUBCONTRACT NO: 107061

RISK DRIVERS		
SEDIMENT	MUSKRAT	SHREW

COPCs CONTRIBUTING TO RISK	
PCB AROCLORS	
PCB CONGENERS	
CHROMIUM	
LEAD	
ZINC	

SOURCE:
SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT, SOUTHWEST PROPERTIES,
VOLUME I OF XXIII, WELLS G&H SUPERFUND SITE, WOBURN, MASSACHUSETTS,
AUGUST 2003

LEGEND

↓ ↓ FORESTED SCRUB SHRUB
↓ ↓ ↓ WETLAND AREA

↓ ↓ SEASONALLY PONDED
↓ ↓ ↓ WETLAND AREA

--- APPROXIMATE
PONDED/FORESTED
WETLAND BOUNDARY
- - - - - STREAM OR
WETLAND
--- PROPERTY LINE

02136/SOUTHWEST/RISK ASSESSMENT/ES-3

MURPHY SITE

WHITNEY SITE

MURPHY WETLAND

WILDWOOD PROPERTY

ABERJONA SITE

APPROXIMATE
GRAPHIC SCALE

0' 50' 100'

FIGURE ES-3
ECOLOGICAL RISK
ASSESSMENT SUMMARY
SOUTHWEST PROPERTIES
WELLS G&H SUPERFUND SITE
OPERABLE UNIT 2
WOBURN, MASSACHUSETTS

M&E Metcalf & Eddy

TRC

Boott Mills South
Foot of John Street
Lowell, MA 01852
978-970-5600

TRC PROJ. NO.: 02136-0390-01467

EPA CONTRACT NO.: 68-W6-0042

RAC SUBCONTRACT NO.: 107061